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# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re:	§	Case No. 22-90000-mxm11
ROCKALL ENERGY HOLDINGS, LLC, et al.,	§ §	Chapter 11
ROCKIEL ENERGY HOLDINGS, ELO, U. un,	§	
Reorganized Debtors.	§	Jointly Administered
Reorganized Debtors.	8 8	John y Administrate
	§	
TALCO DETROLEUM LLC and	§	
TALCO PETROLEUM LLC and	§	
WHITE MARLIN OPERATING	§	
CO., LLC,	§	
	§	
	§	
Plaintiffs	§	
	§	
<b>v.</b>	§	Adversary No. 23-09003-mxm
	§	•
FORMENTERA PARTNERS	§	
FUND I, LP and U.S. SPECIALTY	§	
INSURANCE CO.,		
	§ §	
Defendants	8 8	
Detenuants	8	

APPENDIX IN SUPPORT OF DEFENDANT FORMENTERA PARTNERS FUND I, LP'S RULE 12(B)(6) MOTION TO DISMISS

Ex.	Description	Appx. pp.
1.	Notice of (I) Successful Bidder with Respect to the Sale of Substantially All of the Debtors' Assets; (II) Cancellation of Auction; and (III) Adjournment and Rescheduling of (A) Sale Hearing and (B) Combined Hearing (Case No. 22-90000 (MXM), Doc. 513 (Bankr. N.D. Tex. May 20, 2022)) (the "Notice of Successful Bidder") and the Purchase and Sale Agreement by and among Rockall ND, LLC, Rockall Midstream, LLC, Rockall Agent Corp., Rockall MS, LLC, Rockall Laurel, LLC, Rockall EOR, LLC, Rockall LA, LLC, Rockall Pine Prairie, LLC, White Marlin Midstream, LLC, Petro Harvester Operating Co., LLC, and Rockall Energy LLC, Individually each a Seller and collectively, as Sellers, and Formentera Partners Fund I, LP, as Purchaser (the "PSA"), attached to the Notice of Successful Bidder as Ex. A	1-866
2	Payment and Indemnity Agreement No. 1490	867-72
3.	Findings of Fact, Conclusions of Law, and Order (I) Approving (A) the Disclosure Statement and (B) the Disclosure Statement Supplement; (II) Confirming the Debtors' Amended Joint Chapter 11 Plan; and (III) Authorizing the Sale of the Debtors' Assets (Case No. 22-90000 (MXM), Doc. 600 (Bankr. N.D. Tex. June 2, 2022)) (the "Confirmation Order") and the Sale Approval Supplement to Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving (A) the Disclosure Statement, and (B) the Disclosure Statement Supplement, and (II) Confirming the Debtors' Amended Joint Chapter 11 Plan (the "Sale Approval Order"), attached to the Confirmation Order as Exhibit B.	873-1,183

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Respectfully submitted this the 14th day of June, 2023.

#### /s/ Taylor W. Meek

Tres Cleveland (*pro hac vice* application to be filed) Evan N. Parrott (*pro hac vice* application to be filed) Taylor W. Meek (Texas Bar I.D. No. 24100197)

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of June, 2023, a true and correct copy of the above Notice has been served electronically on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in the above-styled adversary proceeding.

<u>/s/ Taylor Meek</u> OF COUNSEL